



MISSISSIPPI HUNTING DOG ASSOCIATION, INC.

**Review of the University of Georgia Report on Deer Hunting with Dogs:**

*Evaluating Dog-hunting for White-tailed Deer: Dog Movements, Deer Movements, and the Potential Suitability of National Forest Lands for Dog-hunting in Mississippi*

**&**

**The National Forests in Mississippi Executive Summary**

**September 28, 2019**

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**Background:**

On September 25, 2019, the Mississippi Hunting Dog Association was provided a copy of the University of Georgia Report on Deer Dog Hunting and the National Forests in Mississippi Executive Summary. For the purposes of this review, the University of Georgia Report on Deer Hunting with Dogs will be referred to as “report”, the executive summary provided by National Forests in Mississippi will be referred to as “executive summary” and deer hunting with dogs will be referred to as “dog-deer”.

**Review Comments:**

- 1) It is important to note that the report was not a new study on dog-deer hunting or dog- deer hunting in Mississippi, but a review of preexisting literature involving deer movements and dog-deer hunting. Based on selected information, the authors of the report attempted to overlay potential deer movements onto maps of Mississippi National Forests to determine areas suitable to dog-deer hunting.
- 2) **On at least thirteen occasions, the report acknowledged that there was insufficient data involving deer movements or dog-deer hunting and/or conclusions were based on estimates or assumptions.**
  - a. “It should be noted that **no studies** were designed specifically to assess intricate behaviors of deer chased by dogs in relation to property boundaries. (Page 2)

*RPRAM: Knowledge of intricate behaviors of deer is not needed to regulate this sport. Only knowing the distance traveled by deer when being chased by dogs is needed to see that large areas are required to contain deer dogs and prevent their trespass onto lands where they are not wanted.*

- b. "...this review aims to summarize findings of previous research which are relevant to extrapolating how dog-hunting **might** impact deer movements outside of deer home range." (Page 2)

*RPRAM: Certainty in science is rare. That's why well-defined statistical procedures, including the use of probabilities, are used in the analysis of data and construction and analysis of predictive models.*

- c. "We will define **reasonable** ranges of values for... changes in deer movements in response to hunting with dogs." (Page 3)
- d. There is **no information** in the primary literature about deer movements relative to dog-hunting as it is practiced on public lands today, regulation of dog hunting within the broader framework of deer population management, and management of dog-hunting to minimize conflicts with other hunters and landowners adjacent to public dog-hunting areas. (Page 3)
- e. "There is **limited information** in the primary literature concerning movement of deer relative to dog-hunting." (Page 9)
- f. "The sizes, configurations, and arrangements of deer home ranges on the landscape are **unknown** for most areas of the southeastern U.S." (Page 10)
- g. We believe that applying a range **estimate... is reasonable...** since **no data were** available for the study area." (Page 10)
- h. "Mean estimated data of chase" (Page 22)
- i. "...assumed distributions of deer home ranges, the **probability** of a deer exiting its home range..." (Page 55)

*RPRAM: Almost everything in science is an **estimate** because you can seldom sample the entire population of anything you are trying to measure. Scientists sample a portion of anything they are trying to analyze and then use statistics to **estimate** what the results would be on the entire population using well-defined probability metrics.*

- 3) The report suggests that current studies do not provide answers to specific management questions: "Well-designed studies using GPS could answer specific management questions to enhance our understanding of the interactions between deer, hunters, hunting and property boundaries." (Page 3)

*RPRAM: This is merely an acknowledgement that there are no studies concerning the **exact** situation in the Mississippi National Forests. It does not mean that the information in the available studies is invalid or not useful.*

- 4) The report concludes that "most dog hunting was contained within a 2.5-mile radius including the area of the focal deer's home range." (Page 9) This same figure was presented in the executive summary. Emphasis was placed on this 2.5-mile radius further

as it was used as a reference point to determine that “UGS identified relatively few contiguous areas in which dogs would likely remain contained on Forest Service land.” (Executive Summary) This 2.5-mile radius conclusion is flawed for the reasons listed in comments #5 - #8.

- 5) Table 2 (Page 22) contains data that appears to contradict the 2.5-mile radius claim:
- a. Of the cited data, the two highest traveled mean estimates were 2.4 miles not 2.5 miles.
  - b. Two of the cited studies indicated that the mean estimated distance was 1.9 miles and 1.6 miles whereas two studies did not list a mean estimated distance.
  - c. One of the studies that concluded the estimated mean distance traveled of 2.4 miles was titled “Preliminary study of the effects of dogs on radio-equipped deer in a mountainous habitat.” (Page 46) It should be important to note there are no mountainous habitats on the National Forests in Mississippi.

*RPRAM: First, the mean is more or less “in the middle”. That’s not the only number that you would use to calculate the area needed to contain dogs chasing deer. You would use the mean along with numbers that describe longer and shorter distances to determine overall movement patterns.*

*RPRAM: re: 5c: Would deer be expected to move farther in mountainous habitats than in the more rolling terrain in MS?*

- d. Data from a seventh study indicating the mean estimated distance was 1 mile was cited but not used (see comment #6).

*RPRAM: Table 2, page 22, actually lists only five studies; Gipson and Sealander (1977) is listed twice, once for the Ozark Mountains of Arkansas and once for the Coastal Plains of Arkansas Since MHDA specifically refers to Campo et al. (1987), let’s look at it. MHDA is confusing the summary statistics presented in Table 2 (page 22) with the parameters used in the simulation part of the study. For a graph of expected distribution of hunt distances and the probability of deer leaving their home ranges, see page 61 of the report. The distance from the home range center where 50% of the deer are expected to remain is 1.19 miles, 70% is 1.41 miles, and 90% is 1.7 miles.*

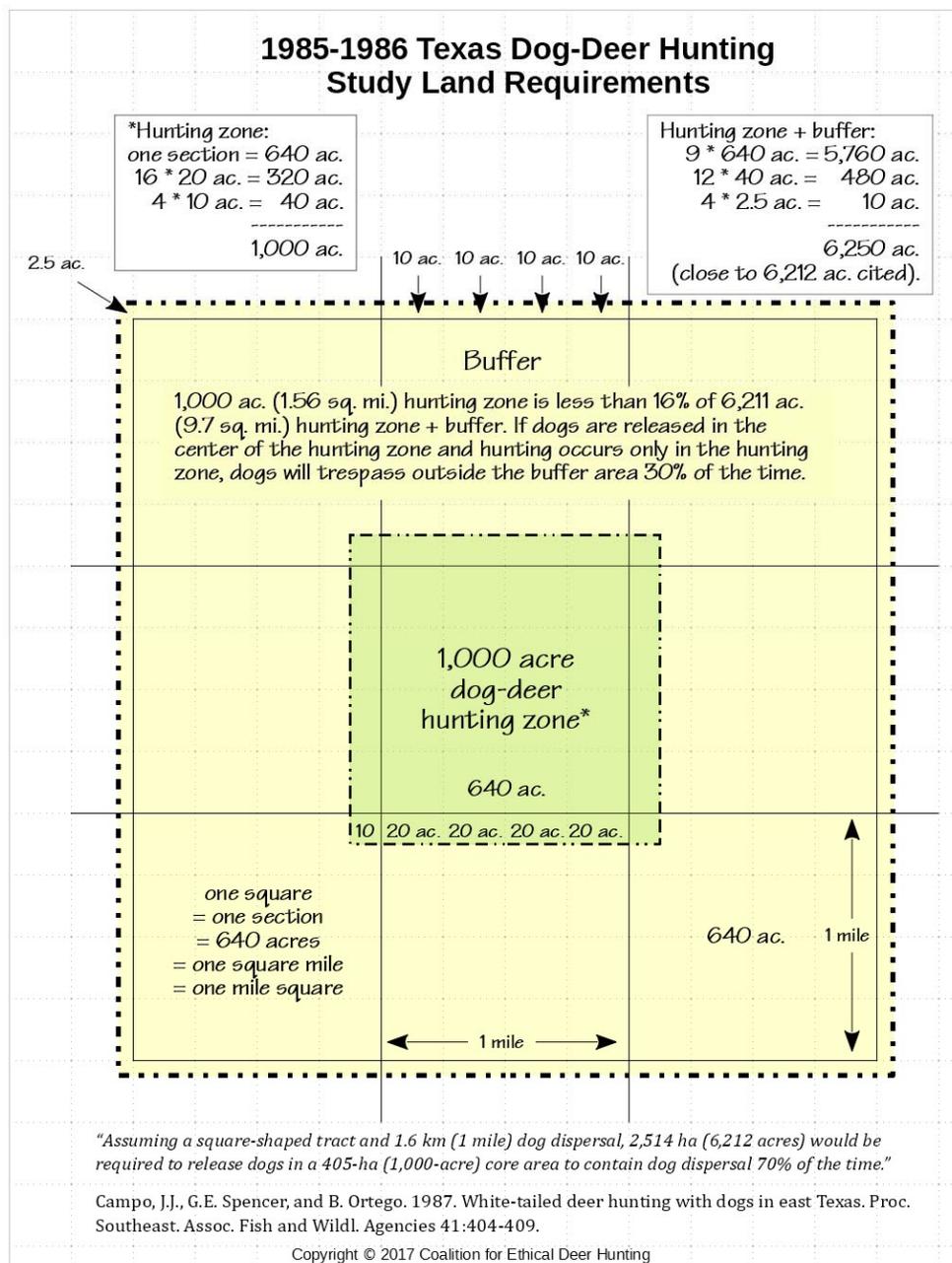
*RPRAM: Diagrams on page 60 show 25 random simulated deer runs and the full sample of 958 simulated deer runs. The diagram with 25 deer runs shows circles depicting different (random) home range centers and distances travelled. Some circles are small, some are large. Some fall within the USFS boundaries, others extend beyond. This small sample illustrates how the circles fall on the map so that you can see how they look. In the full sample, you can’t see the smaller and larger circles and where they fall in various positions on the map because there are so many. Individual hunt distances are impossible to see in the full sample.*

*RPRAM: On page 72 is a diagram showing shorter hunt distances if dogs are prevented from pushing deer outside their home ranges by using correction collars to stop them within specific distances from USFS hunt boundaries. The maps that follow show more areas where dog-deer hunting might be possible under specific circumstances (to be determined).*

- 6) One study – *Campo, J.J., G.E. Spencer, and B. Ortego. 1987. White-tailed deer hunting with dogs in east Texas* was contained in the latter portion of the report (Page 45) but the data was not used in Table 2 (Page 22). Within this study, 53 experimental chases of white-tailed deer with dogs averaged 18 minutes and 70% of chases “were within 1.6 km of the dog release point.” It is important to note that 1.6 km equals approximately 1 mile.

*RPRAM: This study concluded that there would be only a 70% chance of dogs staying within a 6,212-acre square if dogs were released to hunt in a square 1,000-acre tract. In other words, dogs hunting within a 1,000-acre block of land would stay in that block over nine sections big (3 \* 3) only 70% of the time. See the diagram below.*

*RPRAM: In other words, in order to contain deer dogs 90% of the time, a tract of land somewhat larger than 6,000 acres would be required. How many 6,000+-acre tracts of contiguous land are available in the National Forests of Mississippi?*



- 7) All of the studies regarding movements of white-tailed deer relative to hunting with dogs listed in Table 2 and in the document appeared to only focus on the distances traveled by deer being pursued by a dog rather than the realities of an actual dog-deer hunt. It would be unrealistic that a dog or dogs would be allowed to travel freely until they lose a scent (which is what the studies focused on) during a dog-deer hunt. Dog-deer hunts are extremely coordinated and constant communication takes place among the hunters. If the dogs are pursuing a deer not legal to harvest or if they start to travel toward an undesired area, efforts to catch the dogs are implemented. Other scenarios not considered are hunts when the deer is harvested.

*RPRAM: If these claims by MHDA were true, there would be little dog trespass on private property because the dogs would be caught after a successful hunt or when they lost the trail. That is obviously not the case. One of our landowners with 29 documented incidents of dog-deer trespass involving 44 dogs has pictures of deer on camera before the hounds in only two of the incidents.*

*RPRAM: In some cases, dogs are deliberately turned out on private land to chase deer onto the National Forest to be shot. This is poaching, pure and simple.*

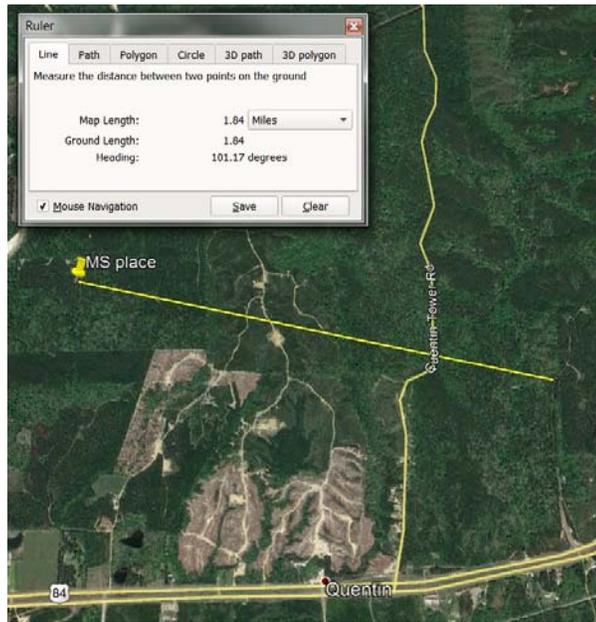
*RPRAM: In a December 29, 2015, video of a dog-deer hunter retrieving deer dogs from the road running between two pieces of private property where the hounds had been trespassing documents dog-deer hunter JS saying, "Do you realize we were hunting 8 miles from here?" How does MHDA explain dogs traveling this far without being caught?*

- 8) Of the studies regarding movements of white-tailed deer relative to hunting with dogs cited within the report, **the most recent study was in 2003**. It is important to note that the most recent study pre-dates the GPS/corrective collars that dog owners are using today. GPS collars provide real-time locations of dogs which allow for the dogs to be caught in a timely manner.

*RPRAM: This comment is flawed because it assumes the dog-deer hunters will actually stop the dog at the right time. We have numerous testimonial incidents of dog-deer hunters dropping dogs on roads through private property specifically to run deer off private land and onto National Forest land to be shot by other waiting dog-deer hunters. Many of these dogs had tracking collars on them.*

*RPRAM: For example, one landowner has date- and time-stamped photos documenting 44 trespassing deer dogs wearing tracking collars. Under the Homochitto permit system, requiring deer dogs wear tracking collars, numerous incidents of dog trespass continue every year.*

*RPRAM: On December 29, 2018, a landowner caught one of three trespassing deer hounds. There is good reason to believe that the dogs were turned out somewhere on Applewhite Road. The shortest distance between the private property where the dog was caught and any point on Applewhite Road is over 1.8 miles. (See graphic that follows.)*



- 9) The report states that the “movement behaviors of deer exposed to hunting with dogs appeared to be similar to their responses to hunting by humans and deer-initiated excursions.” (Page 9). It is important to note that the comparative data referenced for deer-initiated excursions comes from studies that took place in Delaware, Maryland, and Pennsylvania (Pages 7-8). **Per the comparison of deer movements to hunting with dogs, the report concludes that “given their unpredictable nature and short duration, it would be impractical to adjust management of hunting to account for these relatively long distance movements”** (Page 10) when analyzing movements of deer outside of their home range in response to “hunting and during deer initiated excursions.” (Page 10)

*RPRAM: All of these states mentioned do not allow dogs to be used for deer hunting. Additionally, these movements referenced on pages 7 and 8 describe deer movements under no hunting pressure by humans or dogs; i.e., normal deer movements.*

- 10) An exercise was performed “to investigate the **potential** movements of deer in response to dog-hunting in the study area.” (Page 10) It was presumed that the study area was each National Forest in Mississippi as maps were generated for each National Forest. It is also important to note that only estimated data was used in this exercise based on the following statement: “We believe that applying a range estimate... is reasonable to capture the variability among the individual deer since no data **were available for the study area.**” (Pages 10-11) This is very important because this exercise, which conclusions were based on estimated data, is referenced in the Executive Summary: “UGA identified relatively few contiguous areas in which dogs would likely remain contained on Forest Service land.”
- 11) The details of the exercise are further explained on Page 55 of the report. Buffer distances required to contain 50, 70, and 90% of deer-dog hunts were determined by first calculating “a probability **distribution of expected distances white-tailed deer would travel during dog-deer hunts based on parameters from our literature review (Table 1).**” (Page 55). It is important to note that Table 1 is titled “Movements of white-tailed deer relative to hunting by humans without dogs.” It is assumed that the author meant to

reference Table 2 which is titled “Movements of white-tailed deer relative to hunting with dogs.” (Page 22) If that is indeed the case, this utilization of the table is flawed for the reasons stated in comments #4 - #8 above.

*RPRAM: There are two tables labelled Table 1 in the report. This reference to Table 1 describing the study parameters is referring to the Table 1 on page 58, not Table 1 on page 21. Indeed, all the study parameters described in the narrative on page 55 are shown in Table 1 on page 58. The report is divided into three separate tasks. Tasks 1 and 2 each have their own set of tables and figures. Task 3 has no tables or figures.*

*RPRAM: Figure 1 and Figure 2, on pages 60 and 61, graphically represent the simulation data that were produced using the parameters presented in Table 1 on page 58.*

12) The purpose of the exercise was to determine and map areas of the National Forests in Mississippi that would be large enough to dog-deer hunt. The exercise focused on determining containment thresholds for each national forest based on the distance to the “nearest non-Forest Service property.” (Page 56) “The areas available to conduct dog hunts on most national forests properties in Mississippi were relatively minimal (Table 2) given the parameters used in our exercise.” (Page 56) Attempts to adjust management of dog-deer hunting on the results of this exercise would be misguided for the following reasons:

- a. The report indicates that the exercise was based on estimated or missing data (see Comment #10) and the following statement: “We calculated this hunt distance distribution as the joint distribution that resulted from randomly sampling our **assumed distributions** of deer home ranges, the **probability** of a deer exiting its home range during a hunt, distances travelled upon exiting a home range, and the sex ratio of the population.” Page 55

*RPRAM: This is standard scientific protocol: you start with assumptions of what you expect, then collect data, analyze it using probability, then make your best judgement from your “estimate”.*

- b. The exercise uses the “nearest non-Forest Service Property” (Page 56) as a discriminating variable. This variable does not consider that **the nearest non-Forest Service Property may be owned by dog-deer hunters, leased by dog-deer hunters, or owned/leased by individuals that are indifferent to dog-deer hunting.**

*RPRAM: The landownership patterns surrounding the National Forest change often thus making it impossible to impose regulations based on who owns what land and what their hunting preferences might be. Defining areas where you can dog-deer hunt and where you cannot dog-deer hunt is the only workable solution.*

- c. The report indicates that the results of the simulations are “**liberal estimates**”. (Page 57)

*RPRAM: The less liberal estimates can be found under the section where correction collars are discussed. More areas are potentially available if correction collars are required and used.*

- 13) In summary of various interviews with personnel from Florida, the report noted and the executive summary restated that “Sufficient spatial separation of dog-hunting activities, including dogs, vehicles, and hunters, from in-holdings, adjacent properties, sensitive areas, and still-hunt areas is key to successfully implementing dog-hunting even when correction collars are required.” (Page 90) What is not stated is that the National Forests of Mississippi are public lands that should be equally available to all users.

*RPRAM: Not when one user group is causing major problems for other users and safety hazards for the general public. There are already areas of National Forests in Mississippi that are closed to dog-deer hunting and areas that are open or closed to specific other activities. When dog-deer hunters are using an area, it is unsuitable for hikers, horseback riders, birdwatchers, and other users. This sometimes includes still hunters, but we are primarily concerned about interference with still hunters hunting on private land.*

This statement stops short of suggesting its ok to use all of the open public land adjacent to private land to hunt as long as you’re not a dog-deer hunter.

*RPRAM: Still hunters and other types of hunters are causing few, if any, problems for neighboring landowners.*

It also does not take into consideration that the in-holdings may be owned by dog-deer hunters, leased by dog-deer hunters, or owned/leased by individuals that are indifferent to dog-deer hunting.

*RPRAM: See comment about landownership patterns under item 12b above.*

- 14) The report stated that “Roads allow hunters to effectively maneuver in their vehicles and maintain contact with their dogs.” (Page 87) It is important to note that as a result of the implementation of the Travel Management Rule in and around 2010-2012, various forest service roads were closed and blocked to vehicular traffic throughout the National Forests of Mississippi. Since that time, the Mississippi Hunting Dog Association has on multiple occasions presented the opening of closed roads as a viable option to assist with any potential conflicts involving deer hunting with dogs. To date, no roads have been reopened.

*RPRAM: Once “designated areas” are defined, sufficient road access around and through these “designated areas” should be opened for dog-deer hunting. Other roads on areas closed to dog-deer hunting would remain closed as determined by USFS.*

- 15) Even though this entire report was an effort to evaluate dog-deer hunting, **not a single dog-deer hunter was interviewed nor was a dog-deer hunt attended by the authors of the report.**

*RPRAM: Not one landowner was interviewed either! The purpose of the study was not to study dog-deer hunting, per se, but to determine, using knowledge of deer movement and deer dog movement obtained from numerous scientific studies, the tract size and buffer area necessary to eliminate most dog trespass onto private property bordering USFS property, and thus the phrase "Potential Suitability of National Forest Lands for Dog-hunting in Mississippi" in the title of the study.*

Even though dog-deer hunters were not interviewed, the opinions of an individual that was obviously against dog-deer hunting and “government agencies which institute dog-hunting without sufficiently regulating and enforcing trespass issues” was included on Pages 88-89.

*RPRAM: The opinions of five “managers”, three of whom are currently or previously associated with Florida Wildlife Commission, and two associated with Eglin AFB, are included. The comments by the “managers” are all far more pro dog-deer hunting than pro landowner.*

- 16) The USFS executive summary indicated that “over the last several years, we have seen an increase in the amount of and the seriousness of complaints related to private property trespass by deer hunting dogs.” In 2017, the Mississippi Hunting Dog Association filed a FOIA request (File code 6270 2018-FS-R8-01109-F) specifically asking for complaint data involving dog-deer hunting for fiscal years 2014 -2016. In response, the following statement was provided and the request was closed: “Forest Service has determined that your request do[sic] not specifically identify any records.”

*RPRAM: Complaints don’t even begin to capture the number of deer-dog trespass incidents that occur every dog-deer season. Who do people complain to? Are the complaints logged somewhere that they can be recovered and published? Landowners around Homochitto National Forest had to make special arrangements with the District office to record complaints about deer-dog incidents during the 2010-11 season before any complaints were recorded. Additionally, many rural residents don’t think complaining will do any good. They have given up complaining as they believe it is a waste of time so they just hunker down and get run over during the dog-deer season. Many rural residents dread dog-deer season and hate dog-deer hunters. Many are afraid or feel intimidated by the hunters, especially some of the women. The public’s perception of dog-deer hunters is very negative.*

- 17) While the report focused on opinions of interviewees and estimated or missing data, **the report and the executive summary failed to acknowledge and/or analyze the only dog-deer hunting violation data that exists for dog-deer hunting in Mississippi.** The following data was obtained from the MDWFP Annual Deer Report from 2017-2018:

“Homochitto Dog Law” Violations							
10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18
1	8	4	8	11	2	5	9

**Over eight dog-deer seasons, an average of only six tickets per year was issued for violation of the “Homochitto Dog Law.** It is important to note in the Homochitto National Forest, a permit is required to be obtained for all hunting dogs from November 1<sup>st</sup> – January 31<sup>st</sup> which is a total of 92 days. A violation of the “Homochitto Dog Law” could be a dog traveling onto private property, a permit not being obtained, the permit number not being displayed as required, etc. Of these 92 days, 39 days are during dog-deer hunting seasons. In information obtained by a 2014 FOIA request, the total numbers of permits issued for the 2010-2011, 2011-2012, 2012-2013, and 2013-2014 seasons were 816, 654, 653, and 642 respectively. No data on the number of permit holders has been requested for 2014-2018:

Analysis of "Homochitto Dog Law" Violations								
Season	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18
Violations	1	8	4	8	11	2	5	9
Violations Per Day Per Permit Period (92 days)	.01	.09	.04	.09	.12	.02	.05	.10
Violations Per Dog-Deer Hunting Season Day (39 days)*	.03	.21	.10	.21	.28	.05	.13	.23
# Permit Holders	816	654	653	642	-	-	-	-
% of Permit Holders Ticketed	0.1%	1.2%	0.6%	1.2%	-	-	-	-

\* This calculation was based on 39 days which citations may or may not have been written during the dog-deer hunting seasons.

*RPRAM: The Homochitto permit system did not go into effect until the 2011-2012 hunting season (confirmed with personnel at the HNF Ranger Station on October 24, 2019), contrary to MHDA's claim that the system started during the 2010-2011 season.*

*RPRAM: Measuring tickets based on the number of permits or the number of tickets per day are not reasonable or useful metrics. That's like saying that poaching isn't a big deal simply because the percent of hunters issued poaching tickets is small or the poaching tickets per day is small. The same with speeding on the highway. Most speeders get away with speeding. Some use radar to reduce their chances of getting caught.*

*RPRAM: The numbers in the table below for 2011-2012 through 2016-2017 seasons were obtained from Doug Mann, Special Assistant Attorney General, MDWFP. The data were provided in tables listing the names of the people receiving the ticket, the ticket date, and other relevant information. The 2017-2018 data were obtained from Major David Berry, Southern Region Administrator, MDWFP Law Enforcement. In only one season, 2017-2018, do our numbers match those presented in MHDA's tables. One is left to wonder why MHDA would present false or incomplete data.*

<i>Analysis of "Homochitto Dog Law" Violations</i>							
<i>Season</i>	<i>11-12</i>	<i>12-13</i>	<i>13-14</i>	<i>14-15</i>	<i>15-16</i>	<i>16-17</i>	<i>17-18</i>
<i>Trespassing Violations</i>	<i>34</i>	<i>*</i>	<i>8-14**</i>	<i>*</i>	<i>*</i>	<i>7</i>	<i>9***</i>
<i>Total Violations</i>	<i>37</i>	<i>23</i>	<i>15 people, possibly 17 tickets</i>	<i>14</i>	<i>7</i>	<i>10</i>	<i>11***</i>

\* violation type not provided so it was not possible to separate dog-trespass from other violations of the Homochitto Dog law (e.g., no permit number on vehicle or person or dog).

*\*\* both a PDF table and an Excel worksheet were provided. Most names were listed in both, but some were only in one or the other. The smaller number is the people who are listed in both files (even though two appear to have gotten two tickets, they're counted once each in the table). The larger number includes all listed in either file that were not listed as having non-trespass violations.*

*\*\*\* excludes one dog trespass ticket that is pending court resolution, includes landowner-initiated tickets.*

*RPRAM: It should be noted that citations for dog trespassing violations for all seasons except 2017-2018 reflect only the number of dogs that were 1) caught by landowners and 2) issued citations by law enforcement officers. It does not include citations that were issued because of landowner complaints filed in Justice Court by landowners prosecuting independently.*

### **Conclusion:**

While no regulatory proposals have been generated from the information contained within the report at this time, it would not be appropriate to offer a position on any specific recommendation or opinion of the report. With that being said, it is of particular concern that the data used within the report appeared to be out of date,

*RPRAM: Deer home ranges and movements have been studied for decades. The earliest paper cited in the home range study was published in 1967, the latest in 2010. The size of deer home ranges and excursions are well established in the scientific literature. There is a lot of variation, but their ranges are well studied. Is it MHDA's claim that deer movements have changed in the last 10 years?*

insufficient, missing, or estimated

*RPRAM: Upon what are the claims of "insufficient" or "missing" being made? "Estimated" in every study cited is based on measured data. "Estimated" in the study paper is based on the statistical parameters (means, standard deviations, probabilities) presented in the papers surveyed and cited.*

It is also important to note that this was a report about dog-deer hunting and not one dog-deer hunter was interviewed.

*RPRAM: Not one landowner or lease holder was interviewed, either.*

In addition, there were no dog-deer hunts attended or any studies on the usage of GPS/Corrective collars.

*RPRAM: Anecdotal data concerning correction collars was obtained from five "managers" associated with FWC or Eglin AFB. All comments by "managers" concerning correction collars seemed positive, although a primary conclusion (page 89, last sentence) is, "However, no person interviewed believed that correction collars would eliminate trespass or conflict."*

*RPRAM: Also, the "without excursion" maps assume that correction collars are effective and will be used to stop the dogs from leaving designated dog-deer hunting areas.*

*RPRAM: Pages 87-88: “Managers cited anecdotal evidence suggesting that some private timber companies allowed dog-hunters to lease smaller acreages (e.g., 2,500 acres) for hunting because of the effectiveness of correction collars.” Note the size of “smaller acreages” (2,500 acres), and consider that is for one hunting club with their own rules for keeping the dogs contained so as not to lose the lease.*

There was no emphasis or discussion of any dogs within the report other than deer dogs. It is understood that the report was focused on dog-deer hunting, but it is not understood what the rationale is to not include other hunting dogs when potentially considering additional regulatory requirements as that is a constant theme when discussing this issue.

*RPRAM: Other types of hunting dogs are not trespassing on private property in significant numbers, if at all. One might logically conclude that the reason this comment is included by MHDA is to recruit other types of dog hunters to the aid of dog-deer hunters by misleading them into thinking that their sport is being targeted for regulation, also. The RPRAM seeks only regulation of dog-deer hunting while holding other dog-hunting sports exempt for additional regulation.*

Is it that there is a mindset these other dogs can't or don't travel onto private property? If so, that is not the case. What about someone's yard dog that travels through the National Forest onto private property?

*RPRAM: No one is complaining about those other dogs because those other dogs are not causing trespass problems.*

Perhaps the issue has never been about deer dogs on private property as much as it has been the 'ownership' of the deer.

*RPRAM: The deer are owned by the state of Mississippi. If the deer are on someone's private property, it is poaching to release dogs onto that land where they are not welcome to run the deer off the private land and onto the National Forest to be shot. Using the same deer ownership logic presented by MHDA, hunters would be justified in hunting on private property where they do not have permission to hunt. Surely MHDA is not suggesting or supporting that?*

It would be reasonable to expect the violations of the Homochitto Dog Law would be greater if all of the dog-deer hunting complaints for dogs trespassing onto private property were valid.

*RPRAM: **Re: alleged invalid complaints***

*RPRAM: What information is MHDA using to support the implication that complaints about dog trespass onto private property are not valid? Is it perhaps the statements in the last paragraph on page 85 of the GA study made by a “manager”: “The regular presence of law enforcement officers during dog-hunts appeared to decrease the number of complaints from non-hunters?” Wouldn't it be more likely that the regular presence of law enforcement officers reduced the number of dog trespass incidents in the first place, and thus the complaints?*

***RPRAM: Catching dogs to ticket the owner***

*RPRAM: It is estimated that about one in six deer-dog trespass incidents, or fewer, are actually prosecuted by those land owners who will prosecute.*

*RPRAM: First, it's difficult to catch a dog; even the owners often have trouble catching them if radio traffic by hunters retrieving their dogs after a hunt is to be believed. They certainly don't seem to be able to stop them from trespassing on private property where they know the dogs aren't wanted.*

*RPRAM: Even law enforcement officers admit that it's difficult to catch a deer dog. On August 30, 2017, Florida Wildlife Commission (FWC) called two of its law enforcement officers as witnesses in a hearing in the deer-dog trespass case filed by several landowners against FWC. Both officers testified under oath. Lt. Dan Hahr testified that he had caught maybe one or two of the over 20 dogs he had tried to catch. Officer Henry Rockwell estimated that he was successful in catching deer dogs approximately 5% of the time.*

*RPRAM: It may not be convenient for landowners to even try to catch the dog. They may be eating or resting, not dressed to go outside, away from home, busy doing something else, or even physically unable to catch a dog. They may just not be able to go out and catch a deer dog for any number of reasons.*

*RPRAM; Additionally, it is quite a hassle to catch a dog, hold the dog, call the game warden, then wait until the game wardens get there and write the ticket, then have the dog owner come to get their dog and their ticket. It ends up wasting nearly a half a day almost every time. Almost every dog-trespass ticket that has been issued has been validated in court with either guilty pleas (defendants paid their fines in advance of a hearing) or convictions. We've seen only three acquittals.*

Since the complaint data does not appear to be captured anywhere, it is unclear what process, if any, is in place to validate such complaints.

*RPRAM: No one is capturing the complaint data other than tickets being issued under the Homochitto Dog law (from 2011-2012 through 2017-2018, only tickets issued by law enforcement officers, not those issued because of affidavits from landowners). We agree that all complaint data that can be documented needs to be recorded by MDWFP and/or USFS then summarized at the end of hunting season.*

***RPRAM: Facts About Papers Cited in the GA Study***

*RPRAM: There are 62 papers listed in the Literature Cited section. The earliest paper was published in 1943, the most recent in 2018.*

*RPRAM: Deer home range metrics were determined from 19 studies in 9 states (Alabama, Arkansas, Florida, Louisiana, Maryland, Mississippi, Missouri, South Carolina, and Virginia).*

*RPRAM: Papers summarized in the Selected Deer Home Studies in the Southeastern U.S. section: Alabama (1 paper), Florida (2), Georgia (2), Maryland (2), Mississippi (2), and Virginia (1).*

*RPRAM: Papers summarized in the Deer Excursions Unrelated to Hunting section: Maryland (2), Pennsylvania (1), and South Carolina (1).*

*RPRAM: Papers summarized in the Deer Movements Relative to Hunting by Humans section: Connecticut (1), Florida (2), Louisiana (1), Maryland (1), Missouri (1), Nebraska (1), Oklahoma (2), and Virginia (1).*

*RPRAM: Papers summarized in the Deer Movements Relative to Dog-Hunting section: Alabama (2 papers covering a group of states), Arkansas (1), Florida (1, plus 2 papers covering a group of states), Georgia (1 paper covering a group of states), Indiana (1), Missouri (1), North Carolina (1), South Carolina (1, plus 2 papers covering a group of states), Texas (1), Virginia (1), not specified (1).*